REMARKS

Claims 1-70 are currently pending in the application; with claims 1, 11, 30, 43, 59, and 65 being independent. New claims 69 and 70 have been added to define additional aspects of the invention. Applicants respectfully request entry of this amendment and favorable consideration in light of the amendments and remarks presented herein, and earnestly seek timely allowance of the pending claims.

Allowable Subject Matter

The Examiner indicated that claims 5, 10, 16, and 47 are directed to allowable subject matter, but are objected to as depending from rejected base claims. Applicants wish to thank the Examiner for the indication of allowable subject matter.

Claim Rejections – 35 USC §103

The outstanding Office Action indicated that claims 1-4, 6-9, 11-15, 17-46, and 48-68 are rejected under 35 USC §103(a) as being unpatentable over US Patent No. 6, 367,015 to Kubo et al. ("Kubo") in view of US Patent No. 5,777,605 to Yoshinobu et al. ("Yoshinobu"). Applicants submit the Examiner has failed to establish a *prima facie* case of obviousness and traverse this rejection.

Kubo merely discloses an authentication apparatus, which receives coordinates from a coordinate detector through a plurality of discontinuous holes or openings provided on a member, which is used to specify the coordinates to be detected. An authentication is performed

based upon a comparison result of the detected coordinates and a plurality of registered coordinates. (See abstract.)

Kubo further discloses a card provided with a plurality of discontinuous holes or openings which may be placed on the coordinate detector 6, and the coordinate detecting micro computer 4 may read the input coordinates based on inputs made via the hole openings, cutouts or marks (col. 5, lines 59-60; Fig. 5a). The card is placed in a specified region on the coordinate detector 6, the specified region may be a predetermined region decided by a random number. (See col. 6, lines 12-23.)

Two points (point No. 1 and 2) are specified as reference coordinate values and are registered with respect to each location number. (See col. 12, lines 1-13; Figs. 5a and 5b.) These two points determine the position where the card frame 12 is to be displayed on the screen 11. Once card frame 12 is determined to be one of the four locations by the random number and displayed on screen 11, the user places the card in the displayed card frame 12. The user enters input coordinates by pushing cutouts of the card using a pen. It is judged that the authentication is acceptable if the input coordinates match the registered data (col. 12, lines 24-37; Figs. 5a and 5b). By virtue of this arrangement, the user authentication is based upon relative coordinates dictated by the cards openings.

In another embodiment, Kubo shows the card position on a screen of the touch panel. The card position (X0, Y0) is arbitrarily determined by a random number. The card frame 12 is displayed as shown in Fig. 10a using the card position (X0, Y0) as the origin. The card is placed in the displayed card frame 12, and the coordinates are input by pushing the positions of the openings or marks of the card using a pen (col. 15, lines 61-67; Fig. 10). Fig. 10b shows the

relative coordinates described by the card. The bottom left of the card is regarded as the origin (0, 0), and the coordinates of the four points are shown as in Fig. 10b. The card frame 12 shown in Fig. 10a is arranged so that the origin (0, 0) of the card matches the origin (X0, Y0) which is determined by a random number on the screen 11.

The authentication is judged as being acceptable if the relative coordinate values which are actually obtained match the comparison coordinate values, and the authentication is judged as not being acceptable if the coordinate values which are actually obtained do not match the comparison coordinate values. (See col. 16, lines 9-33.)

However, Kubo fails to teach, at least, "checking if the pair of coordinates are within a coordinate area belonging to an authorized user," as recited in claim 1; "a checking device which determines whether the at least one pair of coordinates are associated with at least one coordinate area for authorizing access to the access-protected unit," as recited in claim 11; "determine whether the at least one pair of coordinates are associated with the stored information for authorizing access to the access-protected unit," as recited in claim 30; "checking if the pair of coordinates are within a coordinate area belonging to an authorized user," as recited in claim 43; "a position coding pattern associated with the writing field, wherein the position coding pattern encodes at least one pair of absolute coordinate positions used to grant access authorization," as recited in claim 59; and "granting access to an access-protected unit based upon the at least one pair of coordinates," as recited in claim 65.

Yoshinobu fails to cure the deficiencies of Kubo in this respect. Yoshinobu merely teaches a method and apparatus for inputting coordinate information in which a relative coordinate mode and an absolute coordinate mode is automatically switched depending upon a

contact area. (See abstract.) Specifically, Yoshinobu teaches a system using a tablet 51 for determining position. (See col. 5, lines 26-31.) An area detection circuit operating with the tablet determines which part of the tablet a finger or pen is in contact with and further detects the contact area (col. 5, lines 59-61; Fig. 5). A detection circuit then calculates the X and Y components of the absolute coordinates of the center point of the contact area. The amount of contact area is determined and if it is concluded that it is greater than a predetermined threshold, the detection circuit 61 detects the relative coordinates of point P. If, on the other hand, it is concluded that the contact area is equal to or smaller than a predetermined threshold, a detection circuit 61 detects the absolute coordinates of point P. (See col. 6, lines 3-41; Fig. 5.)

In summary, Yoshinobu merely discloses either detecting absolute or relative coordinates utilizing a tablet based upon the type of "instrument" which is used to come in contact with the tablet.

Neither Kobu nor Yoshinobu teach or suggest, either singly or in combination, the above-quoted features for claims 1, 11, 30, 43, 59, and 65. Applicants submit that Kobu merely discloses using relative coordinates by placing a template on a digitizing tablet, in order to input the coordinates for authentication. (See Fig. 10C, Fig. 12D, and 13A.)

Moreover, Applicants submit that one of ordinary skill in the art would not be motivated to combine the teachings of Kobu and Yoshinobu. Kobu already discloses an input coordinate detector 6 in the form of a tablet which provides coordinates over a range of XY values. Yoshinobu also discloses a tablet, but further discloses means for ascertaining absolute or relative position based upon whether a pen or a finger is being used as an interface with the tablet. Because only relative coordinates are used in the authentication process, Yoshinobu fails

to add any teaching which could cure the deficiencies of Kubo as provided in the arguments above.

Accordingly, Applicants respectfully request the Examiner withdraw the rejection of independent claims 1, 11, 30, 43, 47, 59, and 65. All of the claims depending upon these independent claims are also allowable at least for the reasons provided above. Accordingly, Applicants respectfully request the Examiner withdraw the rejection of claims 1-68.

Conclusion

In view of the above amendments and remarks, this application appears to be in condition for allowance and the Examiner is, therefore, requested to reexamine the application and pass the claims to issue.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact the undersigned at telephone number (703) 205-8000, which is located in the Washington, DC area.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any

additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

December 30, 2005

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